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Chapter 7 Trustee

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH**

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In re

AMMON EDWARD BUNDY,

Debtor.

Bankruptcy No. 24-23530 (WTT)

Chapter 7

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**MOTION FOR ORDER COMPELLING TURNOVER**

Mark C. Rose, in his capacity as Chapter 7 Trustee (the "Trustee") of the bankruptcy estate of Ammon Edward Bundy (the "Debtor"), through his undersigned counsel, moves this Court for an order pursuant to Bankruptcy Code §§ 521, 542, and 105 to compel the turnover of the following property (the "Property"):

- A. 2019 Ford Expedition;
- B. 2020 Ford F 250;
- C. 2007 Chevrolet 2500;
- D. 2006 Gearbox Trailer;
- E. 2010 Polaris Sportsman 550;
- F. 2010 Polaris Sportsman 550; and
- G. \$4,000 cash

In support of this Motion, the Trustee respectfully states as follows:

1. This case was filed under Chapter 7 of the Bankruptcy Code on July 17, 2024 (the "Petition Date"). The Trustee was subsequently appointed as the Debtor's Chapter 7 Trustee.

2. The Debtor's assets include the Property. The Property was disclosed by the Debtor as his assets in his Schedule A/B filed in this case. There is no legal basis for the Debtor to retain the Property. The Property constitutes property of the estate under Bankruptcy Code § 541.

3. The Trustee demanded in writing that the Debtor turn over the Property to him. The Debtor has failed and refused to comply with that demand, in violation of his duties under Bankruptcy Code § 521(a)(3).

4. The Trustee requests entry of an order directing the turnover of the Property, pursuant to Bankruptcy Code § 542.

**WHEREFORE**, the Trustee respectfully requests this Court to impose by order a deadline of fourteen days after the entry of an order of this Court approving this motion for the Debtor to turn over the Property to the Trustee.

Dated: February 21, 2025

**COHNE KINGHORN, P.C.**

/s/ George Hofmann  
GEORGE HOFMANN  
Attorneys for Mark C. Rose,  
Chapter 7 Trustee